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U.S. COURTS
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CAMERON S. BURKE
CLERK IDAHO

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF IDAHO

In Re:

DALE BLUSH, and
LEONA BLUSH,

Debtors.

Case No. 99-01784

MOTION TO MODIFY CONFIRMED
CHAPTER 13 PLAN

Debtors, by and through their attorney, Harold Q Noack, Jr., hereby move this court for its order for modification of their confirmed chapter 13 plan under the provisions of 11 U.S.C.1329 as follows:

1. Dale Blush has undergone major medical procedures leaving \$3,734.04 in medical bills owing by the Debtors, with more medical expense expected in the near future.
2. An Amended Schedule I and J, dated March 15, 2001, are filed herewith indicating the current changes in Debtors' financial situation.
3. A 2nd Amended Schedule I is also filed herewith indicating the change in circumstances beginning July, 2001 when Dale Blush begins receiving his monthly disability payments.
4. Debtors are requesting that the Court confirm their Amended Chapter 13 Plan as proposed.

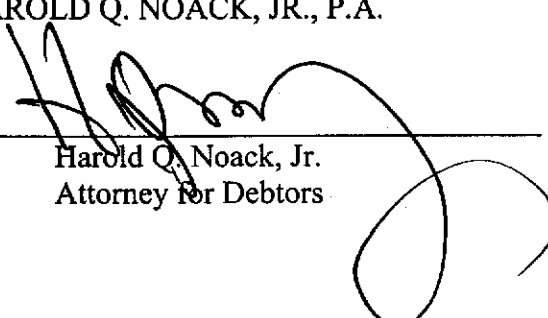
MOTION TO MODIFY CONFIRMED
CHAPTER 13 PLAN - 1

5. Debtors' attorney requests that the Court approve his fee in the amount of \$250.00 as set forth in the Affidavit of Harold Q. Noack, Jr. filed herein.

DATED this 22 day of March, 2001.

HAROLD Q. NOACK, JR., P.A.

By



Harold Q. Noack, Jr.
Attorney for Debtors